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October 26, 2015

VIA U.S. MAIL and EMAIL

Daniel A. Sanchez
2304 Middle Court
Santa Fe, NM 87505
dansanchez911@gmail.com

RE: *Samuel LeDoux*

Dear Mr. Sanchez:

This law firm represents the Northern New Mexico College Board of Regents. I have been authorized to respond to your letter of October 12, 2015, regarding your client Samuel LeDoux.

The College has the authority to bar visitors from its campus. That authority is rooted in its ownership of the property, as well as its policies that require compliance with particular expectations for conduct. Furthermore, the College has an affirmative duty under Title IX to ensure that visitors to campus do not impair or disrupt the educational rights of students.

As you may know, your client was the subject of a police complaint as well as a Title IX complaint. Review of that matter generated evidence that demonstrated that it was more probable than not that Mr. Ledoux had engaged in the conduct alleged. Based on that information and report, the College made a decision that Mr. LeDoux should be barred from College property for a set period of time.

With regard to your request for information, most of your information is not considered a public document subject to inspection. Anything with identifiable student data is FERPA protected. Thus your request for reports, names, notes that reflect student data is rejected. Furthermore, there are no responsive materials that reflect the information on costs or employee hours that you seek. Similarly, there is not a responsive document that lists the

Daniel A. Sanchez
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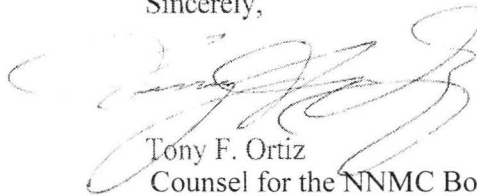
employees involved. That being said, Dr. Patricia Trujillo is the Director of Equity and Diversity and Title IX coordinator.

Despite your suggestion that some other reason was behind the decision to bar Mr. LeDoux from campus, I can assure you that the investigation was initiated because of and hinged solely on the expressed and corroborated concerns of students. The record reflects a very clear pattern of stalking and intimidating behavior by Mr. LeDoux, and I strongly believe, if challenged in any venue, that record of conduct and the witnesses involved would support the College's actions here.

As you may recall from the College's initial letter, this ban is not permanent and can be revisited in the near future. Rather than insisting on an apology and rescission from the College, Mr. LeDoux may want to consider how his conduct created and caused students to perceive him this way, and perhaps he may want to consider apologizing for his misconduct. As the College considers the ban going forward, some expression of apology would certainly be part of any assessment by the College as to whether the ban should end or be extended.

I appreciate your inquiry on these matters. If you have any further questions, please direct them to me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony F. Ortiz', is written over a faint, circular official stamp or seal.

Tony F. Ortiz
Counsel for the NNMCM Board of Regents

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October 12, 2015

Rosario "Chayo" Garcia, President
Northern New Mexico College
921 Paseo de Onate
Espanola, New Mexico 87532

Re: Samuel LeDoux

Dear Ms. Garcia,

On September 10th, 2015, Bernie E. Padilla, SPHR-SCP, Director of Human Resources and Title IX Coordinator, acting on behalf of Northern New Mexico College (NNMC) and the Board of Regents sent a letter to my client, Mr. Samuel LeDoux, ordering him to stay off of Northern New Mexico's Espanola and El Rito campuses and informing him that he was the subject of an investigation by NNMC personnel. Mr. LeDoux was accused of harassing and stalking students from NNMC, informed that a police report had been filed against him, and threatened with arrest if he were to set foot on either of the NNMC campuses.

In response to that letter, on September 23rd, 2015, I sent a letter on behalf of Mr. LeDoux to Mr. Bernie Padilla, with a copy to Domingo Sanchez, Vice President for Finance and Administration, requesting Mr. Padilla provide the specific authority for prohibiting Mr. LeDoux from entering the public property that is the NNMC campuses. At that time, and to date, I contend that there is no evidence against Mr. LeDoux and that the said investigation being conducted by NNMC personnel lacks depth and content. The 10 days given to Mr. Padilla to respond to these requests should have been more than sufficient to address this simple request. To date we have not received any response from Northern.

We are now requesting that the Board of Regents direct NNMC administration to rescind the letter from Mr. Padilla to Mr. LeDoux and to remove all copies from NNMC records and Mr. LeDoux's file, including information regarding the investigation conducted by NNMC personnel. We also request that the Board of Regents formally apologize to Mr. LeDoux for the actions of Mr. Padilla and the Staff and Students of NNMC regarding this matter.

Should the NNMC Board of Regents refuse to meet our requests, then we request that copies of all the information resulting from the NNMC investigation of Mr. LeDoux be provided to us within 10 days. This shall include, but not be limited to, all reports and notes generated from the investigation; the names of all NNMC personnel involved in the conduct of this investigation; the names of all students questioned during this investigation; all relevant financial information regarding this investigation (including NNMC personnel hours/salaries rates expended in the investigation and all public resources used in conducting this investigation); and the names of all NNMC personnel who have been involved in this investigation, have knowledge of this investigation, and who initiated and/or authorized this investigation. This request is pursuant to New Mexico's IPRA.

It is our understanding that several administrators and staff from NNMC have publicly expressed their resentment of my client, Mr. LeDoux, for his efforts to improve the quality of education and to bring forth positive change for the students, facilities, and staff of NNMC, and his requests for transparency in the operations of NNMC. It is our sincere hope that the actions and threats toward Mr. LeDoux described in Mr. Padilla's letter were not motivated by NNMC personnel in attempt to thwart Mr. LeDoux's actions.

A prompt response to this letter from the Board of Regents would be greatly appreciated.

Sincerely,

THE SANCHEZ LAW GROUP, LLC.

Daniel A. Sanchez, Esq.

cc Samuel LeDoux
Damian Martinez, Vice President
Kevin Powers, Secty/ Treasurer
Melinda DeHerrera, Member

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September 23, 2015

Bernie E. Padilla, SPHR - SCP
Dir. of HR & Title IX Coordinator
921 Paseo de Onate
Espanola, NM 87532

Re: Samuel LeDoux & Investigation & Order

Dear Mr. Padilla:

We represent Samuel LeDoux and have been provided your letter of September 10, 2015 to Mr. LeDoux ordering him not to enter onto "Northern's Espanola or El Rito Campuses until further notice".

It appears that your investigation is severely lacking in depth or content as you have not given Mr. LeDoux sufficient information to bar him from going unto a public place. The police report is inconclusive and your allegations in the letter of September 10, 2015 are conclusory and without basis in fact.

Mr. Padilla please advise us under what specific authority you are prohibiting Mr. LeDoux to enter onto public property as his business may take him there. If you do not have such authority, we do not believe you can prohibit Mr. LeDoux from entering unto the Northern campuses. As there is no evidence of threat or disruption, we request that any reference thereto regarding Samuel LeDoux be removed from his file.

We would appreciate a response within 10 days as this is quite insulting and has created significant anxiety in our client, Mr. Samuel LeDoux.

Sincerely,

THE SANCHEZ LAW GROUP, LLC

Daniel Sanchez, Esq.

cc Domingo Sanchez, VP for F & A

Danny Pacheco, Detective, Espanola City Police Department

NORTHERN New Mexico College



September 10, 2015

Samuel LeDoux
PO Box 889
Los Alamos, NM 87544

Sent Certified/Return Receipt
7012 1010 0003 4302 5751

17 Vista Herrera
Santa Fe, NM 87506

Sent Certified/Return Receipt
7012 1010 0003 4302 5768

RE: INVESTIGATION AND ORDER TO STAY OFF PROPERTY

Dear Mr. LeDoux:

This letter is to inform you that Northern New Mexico College (Northern) has received numerous complaints from students alleging that you stalked and harassed a student and that you harassed other students as well. This matter is now under investigation and therefore, you will not be allowed on either Northern's Espanola or El Rito Campuses until further notice. It is also our understanding that a police report has been filed against you by one of Northern's students in regards to these same issues.

This order will remain in effect until you have received **WRITTEN PERMISSION** from me or a College authorized person to be on said property. If you are found on said property in violation of this order you may be subject to arrest and/or prosecution for Criminal Trespass.

As you are aware you are neither a student nor an employee of the College. Nevertheless, it is our expectation that you conduct yourself professionally and that you comply with the directives in this letter. Failure to comply with this order will subject you to immediate arrest.

Once we have concluded the investigation you will be notified of the outcome. If you have any questions regarding this matter should be directed in writing to me at Bernie.Padilla@nnmc.edu.

Respectfully,

Bernie E. Padilla, SPHR - SCP
Director of Human Resources and Title IX Coordinator

cc: Domingo Sanchez, Vice President for Finance and Administration
Andy Romero, Facilities Director
John Waters, Security Supervisor
Danny Pacheco, Detective, Espanola City Police Department

PROPERTY STATUS		PROPERTY TYPE		DRUG TYPE		FIELD UNIT OF MEASURE									
1 - STOLEN 2 - STOLEN & RECOVERED 3 - RECOVERED (STOLEN THIS JURIS.)		4 - RECOVERED (STOLEN OTHER JURIS.) 5 - VOUCHER 6 - LOST		7 - FOUND 8 - COUNTERFEIT/FORGED 9 - DAMAGED/DESTROYED/VANDALIZED		10 - BURNED 11 - SEIZED 12 - USED IN CRIME									
13 - SAFECRACKING 14 - UNKNOWN 15 - EMBEZZLED		16 - ALCOHOL 17 - FIRE ARMS 18 - CLOTHES/WEAR 19 - COMPUTER HARDWARE/SOFTWARE 20 - CONSUMABLE GOODS 21 - CREDIT/DEBIT CARDS 22 - DRUGS/MARIJUANA 23 - DRUGS/MARIJUANA EQUIPMENT		24 - FARM EQUIPMENT 25 - GAMING EQUIPMENT 26 - HEAVY CONSTRUCTION/INDUSTRIAL TOOLS 27 - HOUSEHOLD GOODS 28 - JEWELRY/PERSONAL METALS 29 - LUXURY TOYS 30 - MERCHANDISE		31 - MACHINERY 32 - MEASURABLE INSTRUMENTS 33 - NON-MEASURABLE INSTRUMENTS 34 - OFFICE EQUIPMENT 35 - FUR/SHAWLS/BAGS/WALLETS 36 - RADIO/TV/VIDEO 37 - RECREATION/AUTOMOBIL 38 - STRUCTURES-SINGLE OCCUPANCY 39 - STRUCTURES-OTHER DWELLINGS 40 - STRUCTURES-OTHER COMM. BUSINESS 41 - STRUCTURES-INDUSTRIAL/MAINT. 42 - STRUCTURES-PUBLIC/COMMUNITY 43 - STRUCTURES-STORAGE 44 - STRUCTURES-OTHER 45 - TOOLS 46 - VEHICLE PARTS/ACCESSORIES									
A - CRACK B - COCAINE C - HASHISH		D - HEROIN E - MARIJUANA F - MORPHINE		G - OPIUM H - OTHER NARCOTICS I - LSC		J - TOP K - OTHER HALLUCINOGENS L - AMPH./METHAM.									
M - OTHER STIMULANTS N - BARBITURATES O - OTHER DEPRESSANTS		P - OTHER DRUGS U - UNKNOWN X - OVER 3 TYPES													
1-PROPERTY STATUS		PROPERTY TYPE		TYPE OF ITEM		MAKE / BRAND		MODEL		CALIBER		VALUE (EXCEPT DRUGS)			
SUSPECTED DRUG TYPE		QUANTITY / UNIT OF MEASURE		DESCRIPTION (COLOR, SIZE, FEATURES, ETC.)		SERIAL / OAN						NIC NO.			
2-PROPERTY STATUS		PROPERTY TYPE		TYPE OF ITEM		MAKE / BRAND		MODEL		CALIBER		VALUE (EXCEPT DRUGS)			
SUSPECTED DRUG TYPE		QUANTITY / UNIT OF MEASURE		DESCRIPTION (COLOR, SIZE, FEATURES, ETC.)		SERIAL / OAN						NIC NO.			
3-PROPERTY STATUS		PROPERTY TYPE		TYPE OF ITEM		MAKE / BRAND		MODEL		CALIBER		VALUE (EXCEPT DRUGS)			
SUSPECTED DRUG TYPE		QUANTITY / UNIT OF MEASURE		DESCRIPTION (COLOR, SIZE, FEATURES, ETC.)		SERIAL / OAN						NIC NO.			
4-PROPERTY STATUS		PROPERTY TYPE		TYPE OF ITEM		MAKE / BRAND		MODEL		CALIBER		VALUE (EXCEPT DRUGS)			
SUSPECTED DRUG TYPE		QUANTITY / UNIT OF MEASURE		DESCRIPTION (COLOR, SIZE, FEATURES, ETC.)		SERIAL / OAN						NIC NO.			
M.O. EVENT CODES (AGENCY OPTIONAL USE)										TOTAL VALUE STOLEN		TOTAL VALUE REC.		ADDITIONAL SUPP.	
										\$		\$			
NARRATIVE															
1. WILL PROSECUTE/TESTIFY SHOULD THE OFFENDER BE ARRESTED? YES NO 2. I UNDERSTAND IT IS A CRIMINAL OFFENSE TO FILE A FALSE REPORT TO POLICE. COMPLAINANT / VICTIM CERTIFICATION SIGNATURE X DATE 09/08/2015															
REPORTING OFFICER				I.D. NO.		DATE		DETECTIVE / FOLLOW UP OFFICER / REFERRED TO				I.D. NO.		DATE	
PACHECO, DANNY				893		09/08/2015								00/00/0000	
ASSISTING OFFICER				I.D. NO.		DATE		PROCESSED BY		DATE		DATA ENTRY PERSON		DATE	
APPROVING OFFICER				I.D. NO.		DATE									
ESPINOZA, DANIEL				853		09/10/2015									
AGENCY OPTIONAL USE (DISTRIBUTION, OTHER OFFICERS, ETC.)								CASES CLEARED BY THIS ARREST CASE NO. CASE NO. CASE NO.							
								EXCEPT CODE A - DEATH OF OFFENDER B - PROSECUTION DECLINED C - EXTRACTION DENIED D - VICTIM REF. TO COOPERATE E - JUVENILE, NO CUSTODY F - NOT APPLICABLE							

Incident Narrative

15-09-017

On September 3, 2015 at approximately 1510 hours, I was dispatched to the Espanola Police Department in reference to a female that wanted to file a police report on harassment. I was advised that I was to make contact with Ariadne Bito.

Upon my arrival at the Police Department, I spoke to Ariadne and two other females that are with the collage the two other females wanted to talk for Ariadne. I advised them that I needed Ariadne to talk for herself. Ariadne stated that a male has been hanging around her office and she feels that he is harassing her. I asked Ariadne what was the male doing that make her feel that he is harassing her. Ariadne stated that he walks around by her office and some how he got a hold of her address and she frighten that he might show up at her residence.

One of the other female stated that she feels that she thinks that it is stalking and not harassment. I advised her that it is not stalking he is not following her around and sending her things. I appear the three females that if no one has called security at any time Ariadne must not be to frighten to have the male around the office. I advised that they need to have something in their policies not allowing people to be hanging around the campus if they are not students. I gave all three of the females a card with my cell number and asked them to call me once they saw the male. I waited three day to get a call from one of the females but I never received a call.

Danny Pacheco #6